December 22, 2000

MEMORANDUM

TO: Gwen P. Fransen
Regional Administrator
Coeur d'Alene Regional Office

FROM: Gary Gates, Air Quality Analyst
Process Engineering
State Technical Services Office

THROUGH: Daniel Salgado
Lead, Process Engineering
State Technical Services Office

SUBJECT: T2-000111, L.D. McFarland Company, Sandpoint
Technical Analysis for a Final Tier II Operating Permit No. (017-00004), Log Peeling

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Section 404.04 (*Rules for the Control of Air Pollution in Idaho*) for Tier II Operating Permits.

PROJECT DESCRIPTION

This project is for the renewal of a Tier II Operating Permit (OP) for L.D. McFarland Company located at Sandpoint, Idaho. The original permit was for a pole treating facility. L.D. McFarland no longer operates the pole treating equipment at the site. The facility is strictly a log peeling operation now. The only emissions sources remaining at the facility are fugitive sources of particulate matter (PM) and particulate matter with a mean aerodynamic diameter of 10 microns or less (PM_{10}).

Log storage area;
Log Peeler with hood;
Bark Hog and conveyor system;
Bark storage; and
Vehicle traffic.

The previous permit dated July 7, 1995 and modified on December 30, 1997 consisted of five emission source categories: Log Peeling Process Area, Wigwam Shell and Cyclone, Natural Gas Boiler, Treatment Vats, and Fugitive Sources. After L.D. McFarland's remediation activities, the sources have been reduced to the Log Peeling Process Area and Fugitive Sources. The other sections of the permit will be removed.

FACILITY DESCRIPTION

L.D. McFarland operates a log peeling operation within the boundaries of the Sandpoint PM_{10} Non-attainment Area. The original Tier II OP was issued under the requirements of the *Sandpoint Area Particulate Matter (PM_{10}) Air Quality Improvement Plan.* The emissions from the above mentioned sources are strictly fugitive emissions of particulate.

Haul trucks deliver raw logs to the facility. The logs are then unloaded and stored on-site. The logs are fed through the peeler where the bark is removed. The bark is then conveyed to a bark hog where it is further processed for sale as hog fuel. After the bark has passed through the hog, it is stored in bins until shipment off-site. The peeled logs are also shipped off-site for further processing.

SUMMARY OF EVENTS

On July 7, 1995, L.D. McFarland received a Tier II OP from DEQ. The permit was modified on December 30, 1997. On May 22, 2000, DEQ received an application for renewal of a Tier II OP from L.D. McFarland. On June 21, 2000, the application was declared complete. The permit was issued for public comment from October 18, 2000 through November 17, 2000. No comments were received.

DISCUSSION

1. Differences Between Original Permit and New Permit

1.1 Log Peeling Operation Section

In the original permit there was a particulate matter limit on pounds per hour and tons per year from the log peeling operation. Those emissions are fugitive emissions and there is no practical procedure to demonstrate compliance with such a limit. The original permit did not have any monitoring, reporting or recordkeeping requirements for the limit either. Therefore, the particulate limit for log peeling fugitives has been removed from this permit. The visible emissions limit and the reasonable control of fugitives are enforceable and will inherently limit fugitive emissions from the log peeling operation. **[TII OP #017-00004 (1995), Page 2, 2.1]**

In the original permit there was one limit that covered visible emissions. I have separated the visible emissions limit and the opacity limit, and I have made them two separate requirements. **[TII OP #017-00004, Page 2, 1.2 and 1.3]**

I have added the general verbiage on fugitive control that is used in our current permits. **[TII OP #017-00004, Page 2, 1.3]**

I have updated the list of process equipment to reflect what is currently operating on site. All of the other equipment that was addressed in the original permit is no longer in service. **[TII OP #017-00004, Page 3, 2.1]**

I have added a monitoring and recordkeeping requirement for the reasonable control of fugitives as required in Section 1.3. **[TII OP #017-00004, Page 3, 3.1]**

I have added a monitoring and recordkeeping requirement for the hours of operation requirement in Section 2.2. This requirement was in the original permit, but there was no recordkeeping or monitoring requirement. This new requirement corrects that oversight. **[TII OP #017-00004, Page 3, 3.2]**

1.2 Fugitive Emission Sources Section

In the original permit there was a particulate matter limit on pounds per hour and tons per year from vehicle traffic. Those emissions are fugitive emissions and there is no practical procedure to demonstrate compliance with such a limit. The original permit did not have any monitoring, reporting or recordkeeping requirements for the limit either. Therefore, the particulate limit for road dust fugitives has been removed from this permit. The visible emissions limit and the reasonable control of fugitives are enforceable and will inherently limit fugitive emissions from the vehicle traffic. **[TII OP #017-00004 (1995), Page 9, 2.1]**

In the original permit there was a speed limit requirement for vehicles on unpaved roads within the facility. There was no monitoring, reporting, or recordkeeping requirements for the requirement. The limit is not practicably enforceable, and therefore it has been removed from this permit. The visible emissions limit, the reasonable control of fugitives, and Chemical Dust Suppressant Application Plan are enforceable and will inherently limit fugitive emissions from the vehicle traffic on the unpaved roads. **[TII OP #017-00004 (1995), Page 9, 3.1]**

Some verbiage was added that addresses the reasonable control of fugitives. Some language was in the original permit, but I added to it to reflect what is issued currently in other permits. **[TII OP #017-00004, Page 5, 2.3]**

Addition of monitoring and recordkeeping for the hours of operation of the street sweeper as required in Section 2.2. This requirement was in the original permit, but there was no recordkeeping or monitoring requirement. This new requirement corrects that oversight. **[TII OP #017-00004, Page 6, 3.1]**

There were a few verbiage changes and some rearranging of requirements. But other than the above listed changes, the permit has not changed.

2. Emission Estimates

The emission limits in the December 30, 1997 permit modification were addressing equipment that is no longer in service or fugitive emission sources. As stated above the emission limits for fugitive sources were removed, however the emission estimates for those sources are still accurate. The emission estimates for the fugitive sources can be found in the expired permit that is attached as Appendix A to this technical memorandum. There were no new emission sources, therefore there was no need to perform any additional emissions estimating.

3. Modeling

No modeling was performed for this permit. This permit is actually a decrease in emissions over the previous permit.

4. Area Classification

L.D. McFarland in Sandpoint, Idaho, is located in AQCR 63. The area is designated as nonattainment for PM_{10} and is currently classified as a moderate, see Section 107d(1) of the CAA for additional details. The area is unclassifiable for all other federal and state criteria air pollutants (i.e., NO_x, CO, VOC, and SO_x).

5. Facility Classification

The facility is not a designated facility as defined in IDAPA 58.01.01.006.25. The facility is classified as a B source because the potential uncontrolled emissions of any criteria pollutant is less than 100 tons per year.

6. Regulatory Review

This OP is subject to the following permitting requirements:

a.	IDAPA 58.01.01.401	Tier II Operating Permit
b.	IDAPA 58.01.01.403	Permit Requirements for Tier II Sources
c.	IDAPA 58.01.01.404.01.c	Opportunity for Public Comment
d.	IDAPA 58.01.01.404.04	Authority to Revise or Renew Operating Permits
e.	IDAPA 58.01.01.406	Obligation to Comply
f.	IDAPA 58.01.01.470	Permit Application Fees for Tier II Permits
g.	IDAPA 58.01.01.625	Visible Emission Limitation
h.	IDAPA 58.01.01.650	General Rules for the Control of Fugitive Dust

FEES

Fees do not apply to this facility in accordance with IDAPA 58.01.01.470.

RECOMMENDATIONS

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue a Tier II OP to L.D. McFarland Company. An opportunity for public comment on the air quality aspects of the proposed OP was provided in accordance with IDAPA 58.01.01.404.01.c. from October 18, 2000 through November 17, 2000. No comments were received.

GG:bm 2041.1005 G:\AIR\WGATES\OP\TIERII\~1\LDMCFA~1\FINAL.TM

cc: DEQ State Office
Coeur d'Alene Regional Office

APPENDIX A

T2-000111, L.D. McFarland Company
Previous Permits

IDAHO DEPARTMENT OF HEALTH AND WELFARE
DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255 (208) 334-5502

December 30, 1997

CERTIFIED MAIL #P 875 705 141

Les D. Lonning, Manager, Technical and Environmental Affairs
L.D. McFarland Company
P.O. Box 1496
Tacoma, Washington 98401-1496

RE: Modification of Tier II Operating Permit #017-00004
L.D. McFarland Company (Sandpoint)

Dear Mr. Lonning:

On October 16, 1997, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a letter from L.D. McFarland Company (McFarland) requesting a modification of the Tier II Operating Permit (OP), consisting of an increase in allowable production. On November 6, 1997, additional information was requested by DEQ to complete the modification analysis. On November 20, 1997, DEQ received a letter dated November 17, 1997, that contained additional information for the project and the responsible official's certification of the submitted information. On November 26, 1997, McFarland's application was declared complete.

Based on review of your application, state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Therefore, please find enclosed the modified Tier II OP (#017-00004) for the emission sources that exist at the facility. The enclosed pages supersede the original pages in your permit, and are effective December 30, 1997. Please replace those pages with those enclosed.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

This Tier II OP action is subject to permit application fees of $500.00 in accordance with IDAPA 16.01.01.470. McFarland's payment for the $500.00 application fee was received on November 17, 1997.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Susan J. Richards, Chief, Air Quality Permitting Bureau, at (208) 373-0502.

Sincerely,

Orville D. Green
Assistant Administrator
Air & Hazardous Waste

GDG\SJR\DAN:jrj...\mcfarland\mcfair-m.ccv

Enclosures

cc: G. Burr, Coeur d'Alene Regional Office
Source File COF

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

017 - 00004

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Natural Gas Boiler

1. SOURCE DESCRIPTION

1.1 Process Description

Process preservative solution is heated by a single natural gas-fired boiler through closed-loop heat exchanger. Process oil (an oil/pesticide mixture of 95% Base Oil (P- and 5% pentachlorophenol) is heated to approximately 200 degrees Fahrenheit (200°F) maximize penetration into poles during the treatment process.

1.2 Control Description

None; boiler emissions vent directly to the atmosphere.

1.3 Equipment Specifications

1.3.1 Boiler Information:

1943 Kewanee Boiler (125 Horsepower)	
Catalog Number:	HT-125
Series IX	
National Board Number:	13078
Working Pressure:	125 p.s.i.

Burner Information:

Garden Piatt Turbulator	
Model Number:	R12-G-30
Fuel:	Natural Gas
Heat Input Range:	2.1 MM Btu/hr minimum to 6.72 MM Btu/hr maxim
Firing Rate:	6.5 MM Btu/hr

1.3.2 Stack parameters: Elevation of boiler stack is minimum of 6.1 meters high wi stack diameter of 0.6 meters.

2. EMISSION LIMITS

2.1 Particulate Matter (PM) emissions from the boiler's stack shall not exceed 0.015 grai per dry standard cubic foot of effluent gas corrected to three percent (3%) oxygen volume as required in IDAPA 16.01.01.677 (Rules for the Control of Air Pollution Idaho).

2.2 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (1 micrometers emissions (PM-10) shall not exceed the pound per hour (lb/hr) and ton p year (T/yr) values listed in Appendix A.

2.3 Oxides of nitrogen (NO_x) emissions shall not exceed the lb/hr and T/yr values listed Appendix A.

2.4 Carbon monoxide (CO) emissions shall not exceed the lb/hr and T/yr values listed Appendix A.

Issued: December 30, 1997
Expires: July 7, 2000

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 0004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Treatment Vats

3. OPERATING REQUIREMENTS

3.1 Maximum annual throughput of pole material treated in the vats shall not exc 1,550,000 cubic feet per year (ft^3/yr).

4. TESTING AND MONITORING REQUIREMENTS:

4.1 Throughput Log

The following information shall be recorded daily and maintained on site for the m recent two (2) year period.

4.1.1 Amount (tons per day) of treated poles (finished product) transported off-si

The amount (tons per day) is subject to the maximum annual throughput 1,550,000 ft^3/yr according to the equation listed below:

$$\#\ \text{Cubic Feet per Day} = \frac{(\#\ \text{Tons shipped})}{\text{day}} * \frac{(2000\ \text{lb})}{\text{ton}} * \frac{(\ ft^3\ )}{32\ \text{lb}}$$

5. REPORTING REQUIREMENTS

5.1 Throughput Log

Access to these records shall be granted to DEQ representatives upon request.

IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

July 7, 1995

CERTIFIED MAIL #P 875 704 100

Todd Brown, Regional Manager
L. D. McFarland Company
P.O. Box 670
Sandpoint, Idaho 83864

RE: Issuance of Tier II Operating Permit (#017-00004) for L.D. McFarland - Sandpoint RACT/RACM Implementation for the Attainment Date Extension Project

Dear Mr. Brown:

In accordance with the requirements of the Sandpoint PM_{10} SIP and the Attainment Date Extension Project, the Division of Environmental Quality (DEQ) is issuing Tier II Operating Permit #017-00004 for L. D. McFarland Company's (McFarland) pole treating facility, located in Sandpoint, Idaho. The enclosed permit reflects the revised PM_{10} emissions inventory and analysis for your facility's operations that McFarland and DEQ developed in response to the June through August, 1994, public comment period.

Upon review of the permit you will note that DEQ did not alter your proposed Tier II Operating Permit in accordance with all of the changes requested in McFarland's June 21, 1995, public comment submittal. The increased throughput requests would require DEQ to analyze and model ambient air quality impacts for an increased emissions scenario. At the present time DEQ cannot investigate this topic further due to the severe time constraints for issuing the operating permits. A more complete explanation of DEQ's actions will be provided to you in DEQ's response package to public comment on the Tier II operating permits. The response package is expected to be issued on approximately July 24, 1995.

DEQ stresses that options exist with the Permit to Construct modification process to address outstanding issues that Mcfarland may feel have not been addressed in your operating permit. Several of McFarland's public comments would require remodeling of the SIP emissions inventory. Therefore, the Tier II Operating Permit and the newly-revised SIP plan itself would be legally required to once again be revised and submitted for another public comment review. If this were to occur, an extension of the attainment date for the Sandpoint "moderate" PM_{10} nonattainment area would not be granted by EPA, and the area would be redesignated a "serious" PM_{10} nonattainment area. The redesignation will also occur if one or more of the four affected industrial facilities contests the issuance of their Tier II Operating Permit, according to EPA.

The operating permits are required to be in place to demonstrate to EPA that RACT/RACM have been implemented, and thereby, allow Sandpoint to receive a deadline extension for the demonstration of the attainment of the 24-hour PM_{10} standard.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Brian R. Monson, Chief, Operating Permits Bureau, at (208) 334-5898.

Sincerely,

Orville D. Green
Assistant Administrator
Permits and Enforcement

ODG\BRM\DAH:jrj ...\permit\letters\mcfarsan.cov

Enclosure

cc: D. Redline, NIRO
Source File
Mike McGown, CP
D. Cole, EPA-IOO
COF
L. Kronberg, AG

STATE OF IDAHO
AIR POLLUTION
OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER: 017 - 00004

AQCR: 063

CLASS: B

SIC: 2491

ZONE: 11

UTM COORDINATE (km): 532.5, 5348.0

1. Permittee
L. D. McFarland Company

2. PROJECT
Thermal/Chemical Treatment Process for Poles/Sandpoint PM_{10} State Implementation Plan Operating Permit

3. ADDRESS	TELEPHONE #	COUNTY
P.O. Box 670	(208) 263-2141	Bonner
4. CITY	**STATE**	**ZIP CODE**
Sandpoint	Idaho	83864
5. PERSON TO CONTACT	**TITLE**	
Todd Brown	Regional Manager	

6. EXACT PLANT LOCATION 975 Baldy Mountain Road, Sandpoint, Idaho
Map location: N 1/2, SW 1/4, Sec. 15 T57N R2W

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Processing and treatment of wooden poles with pesticide/preservative solution

8. GENERAL CONDITIONS

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION MADE AVAILABLE TO THE DEPARTMENT. CHANGES IN DESIGN, OPERATION, OR EQUIPMENT THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT.

ASSISTANT ADMINISTRATOR
DIVISION OF ENVIRONMENTAL QUALITY

DATE ISSUED July 7, 1995

DATE EXPIRES July 7, 2000

AIR POLLUTION OPERATING PERMIT

Permittee AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

OURCE

igwam Shell and Cyclone

SOURCE DESCRIPTION

1.1 Process Description

Following peeling, bark and other wood residuals are collected and transferred pneumatically through ductwork to a woodwaste cyclone. The cyclone is located directly adjacent to the wigwam burner. Large diameter chips and bark drop directly into the wigwam burner shell where it is temporarily stored. Use of the wigwam for the purpose of combustion is prohibited. When the amount of woodwaste exceeds the capacity of the wigwam shell the excess woodwaste is transferred to temporary outdoor storage piles by a Pettibone equipped with a front end loader bucket.

1.2 Control Description

Particulate matter emissions with a nominal aerodynamic diameter of ten (10) micrometers or less (PM_{10}) are controlled by a woodwaste cyclone.

1.3 Equipment Specifications

1.3.1 Wigwam burner (No brand name/model number obtainable)

1.3.1.1 Performance design characteristics: None available.

1.2.1.2 Stack parameters: Elevation of wigwam vent is minimum of 15.2 meters high with vent area of 4.6 square meters.

1.3.2 Woodwaste cyclone (Manufacturer/Model number/Serial number not available)

1.3.2.1 Performance design characteristics: Actual performance characteristics are unobtainable from known information. None available from manufacturer.

1.3.2.2 Stack parameters: Elevation of cyclone vent is minimum of eighteen (18) meters high with an exhaust vent diameter of thirty-two (32) inches.

EMISSION LIMITS

2.1 Wigwam Burner

Emissions resulting from use of the wigwam for combustion is prohibited. Use of the wigwam burner shell for storage of woodwaste generated by the log process is allowed.

2.2 Woodwaste Cyclone

2.2.1 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM_{10}) shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

Issued: July 7, 1995
Expires: July 7, 2000

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Pols
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Natural Gas Boiler

SOURCE DESCRIPTION

1.1 Process Description

Process preservative solution is heated by a single natural gas-fired boiler through a closed-loop heat exchanger. Process oil (an oil/pesticide mixture of 95% Base Oil (9-9) and 5% pentachlorophenol) is heated to approximately 200 degrees Fahrenheit (200°F) to maximize penetration into poles during the treatment process.

1.2 Control Description

None; boiler emissions vent directly to the atmosphere.

1.3 Equipment Specifications

1.3.1 Boiler Information:

1943 Kewanee Boiler (125 Horsepower)
Catalog Number HT-125
Series IX
National Board Number 13078
Working Pressure 125 p.s.i.

Burner Information:

Garden Platt Turbulator
Model Number R12-G-30
Fuel: Natural Gas
Heat Input Range: 2.1 MM Btu/hr minimum to 6.72 MM Btu/hr maximum
Firing Rate: 6.5 MM Btu/hr

1.3.2 Stack parameters: Elevation of boiler stack is minimum of 6.1 meters high with stack diameter of 0.6 square meters.

EMISSION LIMITS

2.1 Particulate Matter (PM) emissions from the boiler's stack shall not exceed 0.015 grains per dry standard cubic foot of effluent gas corrected to three percent (3%) oxygen by volume as required in IDAPA 16.01.01.677 (Rules for the Control of Air Pollution in Idaho).

2.2 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers emissions (PM-10) shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.3 Oxides of nitrogen (NO_x) emissions shall not exceed the lb/hr and T/yr values listed in Appendix A.

2.4 Carbon monoxide (CO) emissions shall not exceed the lb/hr and T/yr values listed in Appendix A.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Treatment Vats

SOURCE DESCRIPTION

1.1 Process Description

The sized, framed, and seasoned poles are transferred to the vat area. The poles either receive full length treatment or butt-treatment according to customer specifications.

For full length treatment, the poles are transferred into the full length vat. Once loading of the vat is completed, lids are put in place, and the vat is filled with pentachlorophenol/P-9 base oil preservative solution. The preservative solution is heated to approximately 200°F via a heat exchanger. After a set period of time, the vat is emptied, the solution temperature reduced to approximately 170°F, and reintroduced to the vat for the cold treatment cycle. After the cold treatment cycle is completed, the treated poles are transferred to a drip pad until drippage ceases. The poles have completed the treating process and are stored temporarily until they are transported off-site by truck.

1.2 Control Description

Fugitive emissions which may result during the treatment process are controlled by lids placed over the vats.

1.3 Equipment Specifications

1.3.1 Full-Length Treatment Vat

1.3.1.1 Performance design characteristics: None applicable to permitting.

1.3.1.2 Vat Dimensions: 10 feet x 8 feet x 109 feet.

1.3.2 Number 1 Butt Vat

1.3.1.1 Performance design characteristics: None applicable to permitting.

1.3.1.2 Vat Dimensions: 10 feet x 11 feet x 20 feet.

1.3.3 Number 2 Butt Vat

1.3.1.1 Performance design characteristics: None applicable to permitting.

1.3.1.2 Vat Dimensions: 8 feet x 12 feet x 21 feet.

EMISSION LIMITS

2.1 Visible emissions shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 and using the Department's "Procedures Manual for Air Pollution Control".

Issued: July 7, 1995
Expires: July 7, 2000

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AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

OURCE

gitive Emission Sources

SOURCE DESCRIPTION:

1.1 Process Description

This section of the permit includes vehicle traffic on paved and unpaved roads. Fugitive emissions from log peeling storage piles are considered minimal due to the typically coarse nature and high moisture content of waste product.

EMISSION LIMITS

2.1 Fugitive Emissions

Particulate Matter (PM) and PM_{10} emissions from these fugitive emission sources shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

OPERATING REQUIREMENTS:

3.1 Speed Limit

All traffic (including but not limited to trucks, front-end loader, Pettibones, and cars) shall be restricted to an average speed of five miles per hour (5 mi/hr) while traveling on unpaved roads within the facility.

3.2 Street Sweeper

Use of a street sweeper and water flushing is required on paved access roads and other paved areas of facility property at least once a week during periods when pavement is dry.

3.3 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 16.01.01.650:

3.3.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) at least once every summer. Application of water as a dust suppressant is required for unpaved areas. The ESCDS shall be applied in sufficient quantities so as to provide reasonable control of fugitive dust from the unpaved haul roads and unpaved travel areas.

TESTING AND MONITORING REQUIREMENTS

4.1 Chemical Dust Suppressant Application Plan

4.1.1 The Permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP). The CDSAP shall include:

4.1.1.1 Brand name and chemical composition of the ESCDS selected for use.

4.1.1.2 Dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.

Issued: July 7, 1995
Expires: July 7, 2000

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APPENDIX A

L.D. McFarland Company

Emission Limits[a] - Hourly (lb/hr) and Annual[b] (T/yr)

Source Description	PM10 Emissions		NOx		CO		VOC		SO2	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
1. Log Peeler Fugitives	0.19	0.47	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. Woodwaste Cyclone	0.8	2.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Natural Gas Boiler	0.03	0.40	0.67	1.7	0.14	0.35	0.026	0.064	0.004	0.010
4. Vehicle Fugitives	0.08	2.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

a As determined by a pollutant specific U.S. EPA reference method, or a Department approved alternative, or as determined by the Department's emission estima methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process may operate(s), OR by actual annual production rates.

c Includes condensables.

N/A = Not Applicable

The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

J. The Permittee shall provide the Department a minimum of fifteen (15) working days' notice prior to the scheduled date of any emissions test required pursuant to this permit. The Permittee shall notify the Department of any change in the testing schedule and shall provide at least one (1) working day's notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

K. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

L. Operation information shall include daily and annual hours of operation, and process throughput rate(s) as applied to development of permit conditions.

M. Any records of performance tests, and any other information collected to ascertain whether limits of this permit are being met shall be kept in an easily accessible location at the permitted facility for at least two (2) years.

The Permittee shall submit a test protocol for any performance test to be conducted to the Department for approval at least thirty (30) days prior to each test date. Each performance test report, including related process data, shall be submitted to the Department within thirty (30) days of the date on which the performance test is conducted.

December 22, 2000

MEMORANDUM

TO: Gwen P. Fransen
Regional Administrator
Coeur d'Alene Regional Office

FROM: Gary Gates, Air Quality Analyst
Process Engineering
State Technical Services Office

THROUGH: Daniel Salgado
Lead, Process Engineering
State Technical Services Office

SUBJECT: T2-000111, L.D. McFarland Company, Sandpoint
Technical Analysis for ~~Proposed~~ Tier II Operating Permit No. (017-00004), Log Peeling
Final

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Section 404.04 (*Rules for the Control of Air Pollution in Idaho*) for Tier II Operating Permits.

PROJECT DESCRIPTION

This project is for the renewal of a Tier II Operating Permit (OP) for L.D. McFarland Company located at Sandpoint, Idaho. The original permit was for a pole treating facility. L.D. McFarland no longer operates the pole treating equipment at the site. The facility is strictly a log peeling operation now. The only emissions sources remaining at the facility are fugitive sources of particulate matter (PM) and particulate matter with a mean aerodynamic diameter of 10 microns or less (PM_{10}).

Log storage area;
Log Peeler with hood;
Bark Hog and conveyor system;
Bark storage; and
Vehicle traffic.

The previous permit dated July 7, 1995 and modified on December 30, 1997 consisted of five emission source categories: Log Peeling Process Area, Wigwam Shell and Cyclone, Natural Gas Boiler, Treatment Vats, and Fugitive Sources. After L.D. McFarland's remediation activities, the sources have been reduced to the Log Peeling Process Area and Fugitive Sources. The other sections of the permit will be removed.

FACILITY DESCRIPTION

L.D. McFarland operates a log peeling operation within the boundaries of the Sandpoint PM_{10} Non-attainment Area. The original Tier II OP was issued under the requirements of the *Sandpoint Area Particulate Matter (PM_{10}) Air Quality Improvement Plan*. The emissions from the above mentioned sources are strictly fugitive emissions of particulate.

Haul trucks deliver raw logs to the facility. The logs are then unloaded and stored on-site. The logs are fed through the peeler where the bark is removed. The bark is then conveyed to a bark hog where it is further processed for sale as hog fuel. After the bark has passed through the hog, it is stored in bins until shipment off-site. The peeled logs are also shipped off-site for further processing.

SUMMARY OF EVENTS

On July 7, 1995, L.D. McFarland received a Tier II OP from DEQ. The permit was modified on December 30, 1997. On May 22, 2000, DEQ received an application for renewal of a Tier II OP from L.D. McFarland. On June 21, 2000, the application was declared complete. The permit was issued for public comment from October 18, 2000 through November 17, 2000. No comments were received.

DISCUSSION

1. Differences Between Original Permit and Proposed New Permit

1.1 Log Peeling Operation Section

In the original permit there was a particulate matter limit on pounds per hour and tons per year from the log peeling operation. Those emissions are fugitive emissions and there is no practical procedure to demonstrate compliance with such a limit. The original permit did not have any monitoring, reporting or recordkeeping requirements for the limit either. Therefore, the particulate limit for log peeling fugitives has been removed from the proposed permit. The visible emissions limit and the reasonable control of fugitives are enforceable and will inherently limit fugitive emissions from the log peeling operation. **[TII OP #017-00004 (1995), Page 2, 2.1]**

In the original permit there was one limit that covered visible emissions. I have separated the visible emissions limit and the opacity limit, and I have made them two separate requirements. **[TII OP #017-00004, Page 2, 1.2 and 1.3]**

I have added the general verbiage on fugitive control that is used in our current permits. **[TII OP #017-00004, Page 2, 1.3]**

I have updated the list of process equipment to reflect what is currently operating on site. All of the other equipment that was addressed in the original permit is no longer in service. **[TII OP #017-00004, Page 3, 2.1]**

I have added a monitoring and recordkeeping requirement for the reasonable control of fugitives as required in Section 1.3. **[TII OP #017-00004, Page 3, 3.1]**

I have added a monitoring and recordkeeping requirement for the hours of operation requirement in Section 2.2. This requirement was in the original permit, but there was no recordkeeping or monitoring requirement. This new requirement corrects that oversight. **[TII OP #017-00004, Page 3, 3.2]**

1.2 Fugitive Emission Sources Section

In the original permit there was a particulate matter limit on pounds per hour and tons per year from vehicle traffic. Those emissions are fugitive emissions and there is no practical procedure to demonstrate compliance with such a limit. The original permit did not have any monitoring, reporting or recordkeeping requirements for the limit either. Therefore, the particulate limit for road dust fugitives has been removed from the proposed permit. The visible emissions limit and the reasonable control of fugitives are enforceable and will inherently limit fugitive emissions from the vehicle traffic. **[TII OP #017-00004 (1995), Page 9, 2.1]**

In the original permit there was a speed limit requirement for vehicles on unpaved roads within the facility. There was no monitoring, reporting, or recordkeeping requirements for the requirement. The limit is not practicably enforceable, and therefore it has been removed from the proposed permit. The visible emissions limit, the reasonable control of fugitives, and Chemical Dust Suppressant Application Plan are enforceable and will inherently limit fugitive emissions from the vehicle traffic on the unpaved roads. **[TII OP #017-00004 (1995), Page 9, 3.1]**

Some verbiage was added that addresses the reasonable control of fugitives. Some language was in the original permit, but I added to it to reflect what is issued currently in other permits. **[TII OP #017-00004, Page 5, 2.3]**

Addition of monitoring and recordkeeping for the hours of operation of the street sweeper as required in Section 2.2. This requirement was in the original permit, but there was no recordkeeping or monitoring requirement. This new requirement corrects that oversight. **[TII OP #017-00004, Page 6, 3.1]**

There were a few verbiage changes and some rearranging of requirements. But other than the above listed changes, the permit has not changed.

2. Emission Estimates

The emission limits in the December 30, 1997 permit modification were addressing equipment that is no longer in service or fugitive emission sources. As stated above the emission limits for fugitive sources were removed, however the emission estimates for those sources are still accurate. The emission estimates for the fugitive sources can be found in the expired permit that is attached as Appendix A to this technical memorandum. There were no new emission sources, therefore there was no need to perform any additional emissions estimating.

3. Modeling

No modeling was performed for this permit. This permit is actually a decrease in emissions over the previous permit.

4. Area Classification

L.D. McFarland in Sandpoint, Idaho, is located in AQCR 63. The area is designated as nonattainment for PM_{10} and is currently classified as a moderate, see Section 107d(1) of the CAA for additional details. The area is unclassifiable for all other federal and state criteria air pollutants (i.e., NO_x, CO, VOC, and SO_x).

5. Facility Classification

The facility is not a designated facility as defined in IDAPA 58.01.01.006.25. The facility is classified as a B source because the potential uncontrolled emissions of any criteria pollutant is less than 100 tons per year.

6. Regulatory Review

This OP is subject to the following permitting requirements:

a.	IDAPA 58.01.01.401	Tier II Operating Permit
b.	IDAPA 58.01.01.403	Permit Requirements for Tier II Sources
c.	IDAPA 58.01.01.404.01.c	Opportunity for Public Comment
d.	IDAPA 58.01.01.404.04	Authority to Revise or Renew Operating Permits
e.	IDAPA 58.01.01.406	Obligation to Comply
f.	IDAPA 58.01.01.470	Permit Application Fees for Tier II Permits
g.	IDAPA 58.01.01.625	Visible Emission Limitation
h.	IDAPA 58.01.01.650	General Rules for the Control of Fugitive Dust

FEES

Fees do not apply to this facility in accordance with IDAPA 58.01.01.470.

RECOMMENDATIONS

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue a proposed Tier II OP to L.D. McFarland Company. An opportunity for public comment on the air quality aspects of the proposed OP was provided in accordance with IDAPA 58.01.01.404.01.c. from October 18, 2000 through November 17, 2000. No comments were received.

GG:bm 2041.1005 G:\AH\WGATES\OP\TIERII~1\LDMCFA~1\FINAL.TM

cc: DEQ State Office
Coeur d'Alene Regional Office

APPENDIX A

T2-000111, L.D. McFarland Company
Previous Permits

IDAHO DEPARTMENT OF HEALTH AND WELFARE
DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

December 30, 1997

CERTIFIED MAIL #P 875 705 141

Les D. Lonning, Manager, Technical and Environmental Affairs
L.D. McFarland Company
P.O. Box 1496
Tacoma, Washington 98401-1496

RE: Modification of Tier II Operating Permit #017-00004
L.D. McFarland Company (Sandpoint)

Dear Mr. Lonning:

On October 16, 1997, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a letter from L.D. McFarland Company (McFarland) requesting a modification of the Tier II Operating Permit (OP), consisting of an increase in allowable production. On November 6, 1997, additional information was requested by DEQ to complete the modification analysis. On November 20, 1997, DEQ received a letter dated November 17, 1997, that contained additional information for the project and the responsible official's certification of the submitted information. On November 26, 1997, McFarland's application was declared complete.

Based on review of your application, state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Therefore, please find enclosed the modified Tier II OP (#017-00004) for the emission sources that exist at the facility. The enclosed pages supersede the original pages in your permit, and are effective December 30, 1997. Please replace those pages with those enclosed.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

This Tier II OP action is subject to permit application fees of $500.00 in accordance with IDAPA 16.01.01.470. McFarland's payment for the $500.00 application fee was received on November 17, 1997.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Susan J. Richards, Chief, Air Quality Permitting Bureau, at (208) 373-0502.

Sincerely,

Orville D. Green
Assistant Administrator
Air & Hazardous Waste

ODG\SJR\JAM:jrj..\mcfarland\mcfar-m.ccv

Enclosures

cc: G. Burr, Coeur d'Alene Regional Office
Source File COF

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

0 1 7 - 0 0 0 0 4

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Natural Gas Boiler

1. SOURCE DESCRIPTION

1.1 Process Description

Process preservative solution is heated by a single natural gas-fired boiler through closed-loop heat exchanger. Process oil (an oil/pesticide mixture of 95% Base Oil (P-; and 5% pentachlorophenol) is heated to approximately 200 degrees Fahrenheit (200°F) : maximize penetration into poles during the treatment process.

1.2 Control Description

None; boiler emissions vent directly to the atmosphere.

1.3 Equipment Specifications

1.3.1 Boiler Information:

1943 Kewanee Boiler (125 Horsepower)	
Catalog Number:	HT-125
Series IX	
National Board Number:	13078
Working Pressure:	125 p.s.i.

Burner Information:

Garden Platt Turbulator	
Model Number:	R12-G-30
Fuel:	Natural Gas
Heat Input Range:	2.1 MM Btu/hr minimum to 6.72 MM Btu/hr maxim
Firing Rate:	6.5 MM Btu/hr

1.3.2 Stack parameters: Elevation of boiler stack is minimum of 6.1 meters high wi: stack diameter of 0.6 meters.

2. EMISSION LIMITS

2.1 Particulate Matter (PM) emissions from the boiler's stack shall not exceed 0.015 grai: per dry standard cubic foot of effluent gas corrected to three percent (3%) oxygen : volume as required in IDAPA 16.01.01.677 (Rules for the Control of Air Pollution : Idaho).

2.2 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (1: micrometers emissions (PM-10) shall not exceed the pound per hour (lb/hr) and ton p: year (T/yr) values listed in Appendix A.

2.3 Oxides of nitrogen (NO_x) emissions shall not exceed the lb/hr and T/yr values listed : Appendix A.

2.4 Carbon monoxide (CO) emissions shall not exceed the lb/hr and T/yr values listed : Appendix A.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Treatment Vats

3. OPERATING REQUIREMENTS

3.1 Maximum annual throughput of pole material treated in the vats shall not exc 1,550,000 cubic feet per year (ft^3/yr).

4. TESTING AND MONITORING REQUIREMENTS:

4.1 Throughput Log

The following information shall be recorded daily and maintained on site for the mc recent two (2) year period.

4.1.1 Amount (tons per day) of treated poles (finished product) transported off-sit

The amount (tons per day) is subject to the maximum annual throughput 1,550,000 ft^3/yr according to the equation listed below:

$$\#\ \text{Cubic Feet per Day} = \frac{(\#\ \text{Tons shipped})}{\text{day}} * \frac{(2000\ \text{lb})}{\text{ton}} * \frac{(\ ft^3\ )}{32\ \text{lb}}$$

5. REPORTING REQUIREMENTS

5.1 Throughput Log

Access to these records shall be granted to DEQ representatives upon request.

Issued: December 30, 1997
Expires: July 7, 2000

IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

July 7, 1995

CERTIFIED MAIL #P 875 704 100

Todd Brown, Regional Manager
L. D. McFarland Company
P.O. Box 670
Sandpoint, Idaho 83864

RE: Issuance of Tier II Operating Permit (#017-00004) for L.D. McFarland - Sandpoint RACT/RACM Implementation for the Attainment Date Extension Project

Dear Mr. Brown:

In accordance with the requirements of the Sandpoint PM_{10} SIP and the Attainment Date Extension Project, the Division of Environmental Quality (DEQ) is issuing Tier II Operating Permit #017-00004 for L. D. McFarland Company's (McFarland) pole treating facility, located in Sandpoint, Idaho. The enclosed permit reflects the revised PM_{10} emissions inventory and analysis for your facility's operations that McFarland and DEQ developed in response to the June through August, 1994, public comment period.

Upon review of the permit you will note that DEQ did not alter your proposed Tier II Operating Permit in accordance with all of the changes requested in McFarland's June 21, 1995, public comment submittal. The increased throughput requests would require DEQ to analyze and model ambient air quality impacts for an increased emissions scenario. At the present time DEQ cannot investigate this topic further due to the severe time constraints for issuing the operating permits. A more complete explanation of DEQ's actions will be provided to you in DEQ's response package to public comment on the Tier II operating permits. The response package is expected to be issued on approximately July 24, 1995.

DEQ stresses that options exist with the Permit to Construct modification process to address outstanding issues that McFarland may feel have not been addressed in your operating permit. Several of McFarland's public comments would require remodeling of the SIP emissions inventory. Therefore, the Tier II Operating Permit and the newly-revised SIP plan itself would be legally required to once again be revised and submitted for another public comment review. If this were to occur, an extension of the attainment date for the Sandpoint "moderate" PM_{10} nonattainment area would not be granted by EPA, and the area would be redesignated a "serious" PM_{10} nonattainment area. The redesignation will also occur if one or more of the four affected industrial facilities contests the issuance of their Tier II Operating Permit, according to EPA.

The operating permits are required to be in place to demonstrate to EPA that RACT/RACM have been implemented, and thereby, allow Sandpoint to receive a deadline extension for the demonstration of the attainment of the 24-hour PM_{10} standard.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Brian R. Monson, Chief, Operating Permits Bureau, at (208) 334-5898.

Sincerely,

Martin Bauer OD6

Orville D. Green
Assistant Administrator
Permits and Enforcement

ODG\BRM\DAH:jrj...\permit\letters\mcfariss.cov

Enclosure

cc: D. Redline, NIRO
Source File
Mike McGown, CP
D. Cole, EPA-IOO
COF
L. Kronberg, AG

STATE OF IDAHO
AIR POLLUTION
OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER: 017 - 00004

AQCR: 063

CLASS: B

SIC: 2491

ZONE: 11

UTM COORDINATE (km): 532.5, 5348.0

1. **Permittee**
   L. D. McFarland Company

2. **PROJECT**
   Thermal/Chemical Treatment Process for Poles/Sandpoint PM_{10} State Implementation Plan Operating Permit

3. ADDRESS	TELEPHONE #	COUNTY
P.O. Box 670	(208) 263-2141	Bonner
4. CITY	**STATE**	**ZIP CODE**
Sandpoint	Idaho	83864
5. PERSON TO CONTACT	**TITLE**	
Todd Brown	Regional Manager	

6. **EXACT PLANT LOCATION** 975 Baldy Mountain Road, Sandpoint, Idaho
   Map location: N 1/2, SW 1/4, Sec. 15 T57N R2W

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
   Processing and treatment of wooden poles with pesticide/preservative solution

8. **GENERAL CONDITIONS**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION MADE AVAILABLE TO THE DEPARTMENT. CHANGES IN DESIGN, OPERATION, OR EQUIPMENT THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT.

M Dane for DEQ

ASSISTANT ADMINISTRATOR
DIVISION OF ENVIRONMENTAL QUALITY

DATE ISSUED July 7, 1995

DATE EXPIRES July 7, 2000

AIR POLLUTION OPERATING PERMIT

Permittee AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Wigwam Shell and Cyclone

SOURCE DESCRIPTION

1.1 Process Description

Following peeling, bark and other wood residuals are collected and transferred pneumatically through ductwork to a woodwaste cyclone. The cyclone is located directly adjacent to the wigwam burner. Large diameter chips and bark drop directly into the wigwam burner shell where it is temporarily stored. Use of the wigwam for the purpose of combustion is prohibited. When the amount of woodwaste exceeds the capacity of the wigwam shell the excess woodwaste is transferred to temporary outdoor storage piles by a Pettibone equipped with a front end loader bucket.

1.2 Control Description

Particulate matter emissions with a nominal aerodynamic diameter of ten (10) micrometers or less (PM_{10}) are controlled by a woodwaste cyclone.

1.3 Equipment Specifications

1.3.1 Wigwam burner (No brand name/model number obtainable)

1.3.1.1 Performance design characteristics: None available.

1.3.1.2 Stack parameters: Elevation of wigwam vent is minimum of 15.2 meters high with vent area of 4.6 square meters.

1.3.2 Woodwaste cyclone (Manufacturer/Model number/Serial number not available)

1.3.2.1 Performance design characteristics: Actual performance characteristics are unobtainable from known information. None available from manufacturer.

1.3.2.2 Stack parameters: Elevation of cyclone vent is minimum of eighteen (18) meters high with an exhaust vent diameter of thirty-two (32) inches.

EMISSION LIMITS

2.1 Wigwam Burner

Emissions resulting from use of the wigwam for combustion is prohibited. Use of the wigwam burner shell for storage of woodwaste generated by the log process is allowed.

2.2 Woodwaste Cyclone

2.2.1 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM_{10}) shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

Issued: July 7, 1995
Expires: July 7, 2000

AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

PERMITTEE AND LOCATION

L.D. McFarland Company
Thermal/Chemical Treatment Process for Pols
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Natural Gas Boiler

SOURCE DESCRIPTION

1.1 Process Description

Process preservative solution is heated by a single natural gas-fired boiler through a closed-loop heat exchanger. Process oil (an oil/pesticide mixture of 95% Base Oil (P-9) and 5% pentachlorophenol) is heated to approximately 200 degrees Fahrenheit (200°F) to maximize penetration into poles during the treatment process.

1.2 Control Description

None; boiler emissions vent directly to the atmosphere.

1.3 Equipment Specifications

1.3.1 Boiler Information:

1943 Kewanee Boiler (125 Horsepower)
Catalog Number HT-125
Series IX
National Board Number 13078
Working Pressure 125 p.s.i.

Burner Information:

Garden Platt Turbulator
Model Number R12-G-30
Fuel: Natural Gas
Heat Input Range: 2.1 MM Btu/hr minimum to 6.72 MM Btu/hr maximum
Firing Rate: 6.5 MM Btu/hr

1.3.2 Stack parameters: Elevation of boiler stack is minimum of 6.1 meters high with stack diameter of 0.6 square meters.

EMISSION LIMITS

2.1 Particulate Matter (PM) emissions from the boiler's stack shall not exceed 0.015 grains per dry standard cubic foot of effluent gas corrected to three percent (3%) oxygen by volume as required in IDAPA 16.01.01.677 (Rules for the Control of Air Pollution in Idaho).

2.2 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers emissions (PM-10) shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.3 Oxides of nitrogen (NO_x) emissions shall not exceed the lb/hr and T/yr values listed in Appendix A.

2.4 Carbon monoxide (CO) emissions shall not exceed the lb/hr and T/yr values listed in Appendix A.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Treatment Vats

SOURCE DESCRIPTION

1.1 Process Description

The sized, framed, and seasoned poles are transferred to the vat area. The poles either receive full length treatment or butt-treatment according to customer specifications.

For full length treatment, the poles are transferred into the full length vat. Once loading of the vat is completed, lids are put in place, and the vat is filled with pentachlorophenol/P-9 base oil preservative solution. The preservative solution is heated to approximately 200°F via a heat exchanger. After a set period of time, the vat is emptied, the solution temperature reduced to approximately 170°F, and reintroduced to the vat for the cold treatment cycle. After the cold treatment cycle is completed, the treated poles are transferred to a drip pad until drippage ceases. The poles have completed the treating process and are stored temporarily until they are transported off-site by truck.

1.2 Control Description

Fugitive emissions which may result during the treatment process are controlled by lids placed over the vats.

1.3 Equipment Specifications

1.3.1 Full-Length Treatment Vat

1.3.1.1 Performance design characteristics: None applicable to permitting.

1.3.1.2 Vat Dimensions: 10 feet x 8 feet x 109 feet.

1.3.2 Number 1 Butt Vat

1.3.1.1 Performance design characteristics: None applicable to permitting.

1.3.1.2 Vat Dimensions: 10 feet x 11 feet x 20 feet.

1.3.3 Number 2 Butt Vat

1.3.1.1 Performance design characteristics: None applicable to permitting.

1.3.1.2 Vat Dimensions: 8 feet x 12 feet x 21 feet.

EMISSION LIMITS

2.1 Visible emissions shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 and using the Department's "Procedures Manual for Air Pollution Control".

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

L.D. McFarland Company
Thermal/Chemical Treatment Process for Poles
Sandpoint, Idaho

017 - 00004

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Emission Sources

. SOURCE DESCRIPTION:

1.1 Process Description

This section of the permit includes vehicle traffic on paved and unpaved roads. Fugitive emissions from log peeling storage piles are considered minimal due to the typically coarse nature and high moisture content of waste product.

. EMISSION LIMITS

2.1 Fugitive Emissions

Particulate Matter (PM) and PM_{10} emissions from these fugitive emission sources shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

. OPERATING REQUIREMENTS:

3.1 Speed Limit

All traffic (including but not limited to trucks, front-end loader, Pettibones, and cars) shall be restricted to an average speed of five miles per hour (5 mi/hr) while traveling on unpaved roads within the facility.

3.2 Street Sweeper

Use of a street sweeper and water flushing is required on paved access roads and other paved areas of facility property at least once a week during periods when pavement is dry.

3.3 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 16.01.01.650:

3.3.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) at least once every summer. Application of water as a dust suppressant is required for unpaved areas. The ESCDS shall be applied in sufficient quantities so as to provide reasonable control of fugitive dust from the unpaved haul roads and unpaved travel areas.

TESTING AND MONITORING REQUIREMENTS

4.1 Chemical Dust Suppressant Application Plan

4.1.1 The Permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP). The CDSAP shall include:

4.1.1.1 Brand name and chemical composition of the ESCDS selected for use.

4.1.1.2 Dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.

APPENDIX A

L.D. McFarland Company

Emission Limits[a] - Hourly (lb/hr) and Annual[b] (T/yr)

Source Description	PM_{10}[c]		NO_x		CO		VOC[c]		SO_x	
	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)
1. Log Peeler Fugitives	0.19	0.47	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. Woodwaste Cyclone	0.8	2.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Natural Gas Boiler	0.03	0.40	0.67	1.7	0.14	0.35	0.026	0.064	0.004	0.010
4. Vehicle Fugitives	0.08	2.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

a As determined by a pollutant specific U.S. EPA reference method, or a Department approved alternative, or as determined by the Department's emission estimatio methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es may operate(s), OR by actual annual production rates.

c Includes condensables.

N/A = Not Applicable

I. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

J. The Permittee shall provide the Department a minimum of fifteen (15) working days' notice prior to the scheduled date of any emissions test required pursuant to this permit. The Permittee shall notify the Department of any change in the testing schedule and shall provide at least one (1) working day's notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

K. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

L. Operation information shall include daily and annual hours of operation, and process throughput rate(s) as applied to development of permit conditions.

M. Any records of performance tests, and any other information collected to ascertain whether limits of this permit are being met shall be kept in an easily accessible location at the permitted facility for at least two (2) years.

The Permittee shall submit a test protocol for any performance test to be conducted to the Department for approval at least thirty (30) days prior to each test date. Each performance test report, including related process data, shall be submitted to the Department within thirty (30) days of the date on which the performance test is conducted.

July 6, 2000

MEMORANDUM

TO: Gwen P. Fransen, Administrator
Coeur d'Alene Regional Office

FROM: Gary Gates, Air Quality Analyst
State Technical Services Office

SUBJECT: *PERMIT TO CONSTRUCT APPLICABILITY DETERMINATION TECHNICAL ANALYSIS*
T2-000111, L.D. McFarland Company, Sandpoint
(PTC Applicability Determination)

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*) for Permit to Construct (PTC) requirements.

PROJECT DESCRIPTION

L.D. McFarland is requesting to add a covered bark handling and storage system and a dust control system to their log peeling operation in Sandpoint, Idaho. The new equipment will minimize fugitive dust from the process as well as make the bark recovery system more efficient.

The project does not meet the definition of a modification as defined in IDAPA 16.01.01.006. There is no increase in emissions; there will actually be a reduction of emissions.

SUMMARY OF EVENTS

On April 10, 2000, the Idaho Department of Environmental Quality received an applicability request from L.D. McFarland Company for the bark handling and storage system. On May 10, 2000, DEQ sent a letter stating the need for L.D. McFarland to submit a PTC application. On May 22, 2000, the PTC application was received.

DISCUSSION

1. Process Description

The pole peeling and bark handling system begins with poles being fed into the peeler on carts. The cutter heads on the peeler remove bark, and the bark is then routed into the bark hood behind the peeler. The bark hood is to be equipped with a dust collection system that will capture the finer, airborne particles. The pole infeed into the peeler is to be equipped with a water spray system to mitigate dust. An enclosed conveyor at the bottom of the bark hood conveys the material into the main bark conveyor. The main bark conveyor runs underneath the pole infeed and drops onto a transition conveyor. The transition conveyor moves the bark onto the covered hog feed conveyor. The existing hog is a Montgomery 34HD punch and die hog. The material is then discharged out the bottom of the hog onto the bin conveyor. The enclosed bin conveyor unloads into a pair of Peerless 14 unit bins.

The new additions to the system will minimize particulate matter (PM) emissions while helping to maximize product to the storage bins. The enclosed systems will help eliminate bark being blown off the conveyor and out of storage areas during times of high winds.

2. Equipment Listing

Two Peerless 14 unit storage bins.
Bark Hood dust collection system.

3. Emission Estimates

Emissions were not quantified for this project. There are no new pieces of equipment that would increase emissions. All new equipment will actually reduce emissions of PM. The new equipment is all electric powered so there will not be any fuel burning emissions associated with this project. L.D. McFarland has not requested any emissions reduction credits. For these reasons no emission estimates were needed.

4. Modeling

No modeling was performed for this emission reduction project.

5. Facility Classification

The change of emissions is not significant, therefore no facility classification is necessary for this exemption.

6. Area Classification

The facility is located in Air Quality Control Region (AQCR) 63. The area in which the facility is located is classified as non-attainment for PM_{10} and attainment or unclassifiable for all other criteria pollutants.

7. Regulatory Review

IDAPA 16.01.01.006	General Definitions
IDAPA 16.01.01.201	Permit to Construct Required

8. AIRS Information

This project does not affect the AIRS database.

FEES

Based on available information, L.D. McFarland is not a major facility as defined in IDAPA 16.01.01.008.10 and therefore is not subject to registration and registration fees in accordance with IDAPA 16.01.01.526.

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that L.D. McFarland not be required to obtain a PTC for their bark handling system changes. The changes do not meet the definition of a modification as defined in IDAPA 16.01.01.006. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

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cc: Coeur d'Alene Regional Office
DEQ State Office